Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Parts 22, 90, and 94 of the Commission's Rules to Permit Routine Use of Signal Boosters	)	WT Docket No. 95-70

To: The Commission

REPLY COMMENTS OF THE
AMERICAN MOBILE TELECOMMUNICATIONS ASSOCIATION, INC.

AMERICAN MOBILE TELECOMMUNICATIONS
ASSOCIATION, INC.

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September 1, 1995

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The American Mobile Telecommunications Association, Inc. ("AMTA" or "Association"), by its attorneys, and in accordance with Section 1.415 of the Federal Communications Commission ("FCC" or "Commission") Rules and Regulations, respectfully submits its Reply Comments in the above-entitled proceeding.[1/] The Comments in this proceeding reflect both a significant interest in the broader availability of signal boosters and a recognition that the use of these devices should be managed on a service-by-service basis to reduce their potential for interference. Properly crafted service rules should permit the broader utility of signal boosters without adversely affecting the operation of other systems.

In its Comments in this proceeding, AMTA noted that signal boosters typically are used to permit or enhance coverage in

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1/ In the Matter of Amendment of Parts 22, 90 and 94 of the Commission's Rules to Permit Routine Use of Signal Boosters, WT Docket No. 95-70 (released June 22, 1995) ("Notice"). The Commission extended the deadline for filing comments and reply comments in this proceeding to August 14, 1995, and September 1, 1995, respectively. Order, WT Docket No. 95-70 (released July 12, 1995).

otherwise unreachable portions of a licensee's service area. The Association supported the use of the devices for that purpose and conditioned upon non-interference to other systems. It stated:

> When boosters are employed in an environment in which licensees are assigned blocks of contiguous spectrum throughout a relatively expansive, defined geographic area, such as the cellular service, they enhance system capability with little or no risk of causing inter-system interference. The frequencies being retransmitted are used exclusively by that system operator throughout that geographic area; any inadvertent problems can be easily identified and corrected. AMTA Comments at pp. 4-5.

However, the Association also cautioned that regulatory conditions would be necessary for services which do not enjoy that level of operational exclusivity. Specifically, it suggested that the Commission retain its proposed power level limits and adopt a notification program to preserve the integrity of operations in such services. AMTA Comments at pp. 5-8.

The Comments in this proceeding reflected substantial agreement with the position outlined by the Association. Most parties recognized the utility of signal boosters in certain situations, and recommended that the FCC permit their broader deployment.[2/] However, licensees and representatives of licensees that operate in bands in which spectrum is more intensively reused by multiple parties within relatively close proximity also urged the Commission to proceed cautiously in light

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2/ See, e.g., Comments of RAM Mobile Data USA Limited Partnership ("RMD"), UTC, The Telecommunications Association ("UTC"), and the Mobile and Personal Communications Division, Private Radio Section of the Telecommunications Industries Association ("TIA").

of the interference potential of the devices.[3/] Many Part 90 licensees do not enjoy the type of geographic authorization typified by the cellular service which limits any interference potential to the outer boundaries of a geographically-defined service area. Instead, they continue to be licensed on a frequency and site specific basis, often with limited or no specified co-channel separation standards. Such licensees generally supported the availability of signal boosters on a secondary, non-interference basis in conjunction with some type of recordation or notification process which would enable any adversely affected parties to identify operators of signal boosters in their area.

Thus, AMTA believes that the record in this proceeding supports the adoption of service-specific provisions for implementation of signal boosters. Services with a relatively "clean" co-channel environment, including, but not limited to, the 900 MHz SMR band, should be permitted broad flexibility in their deployment of signal boosters, as long as their use does not extend the licensee's signal beyond the geographic boundaries of its authorized service area.

3/ See, e.g. Comments of Geotek Communications, Inc. ("Geotek"), Nextel Communications, Inc. ("Nextel"), and the Personal Communications Industry Association ("PCIA"). Additionally, the Comments filed by Hewlett-Packard Company ("HP") and SpaceLabs Medical, Inc. ("SpaceLabs") raise specific concerns about the impact of signal boosters on medical telemetry devices operating on the low-power 12.5 KHz offsets at 450-470 MHz. AMTA is confident that the FCC will give appropriate consideration to the issues raised by these parties in light of the vital services these devices provide.

In the 900 MHz SMR service, the Association supports the position being recommended in the Joint Reply Comments of RMD and Geotek. Those two parties have substantial expertise and investment in 900 MHz SMR systems. Collectively they operate the majority of 900 MHz SMR facilities currently in operation. They are expected to participate actively in the upcoming 900 MHz auctions for geographic-based licenses. [4/] These companies are persuaded that Class A signal boosters can be deployed on an unrestricted basis in the 900 MHz SMR environment. They also recommend that Class B boosters be permitted to operate at up to 3 watts under conditions designed to minimize their interference potential. Specifically, Class B boosters would be limited to "in-building" or comparably shielded use on a secondary, non-interference basis, and co-channel operators would be notified of their deployment. The Association urges the FCC to implement the recommendations of RMD and Geotek, and adopt 900 MHz SMR rules consistent with them.

By contrast, the spectral environment in which the 800 MHz SMR industry operates is significantly more congested. Licensees in that band are authorized on a site-by-site and frequency-by-frequency basis with co-channel protection criteria that have varied dramatically during the development of this service, and,

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4/ Second Report & Order and Further Notice of Proposed Rulemaking, In the Matter of Amendment of Parts 2 and 90 of the Commission's Rules to Provide for the Use of 200 Channels Outside the Designated Filing Areas in the 896-901 and the 935-940 MHz Bands Allotted to the Specialized Mobile Radio Pool, PR Docket No 89-553, FCC 95-159 (Released April 17, 1995).

even now, permit intensive co-channel reuse by unrelated entities.[5/] 800 MHz SMRs are not awarded a geographically-defined service area, and typically contend with multiple co-channel systems in relatively close proximity.[6/]

Under these circumstances, AMTA cannot support the Class A and Class B signal boosters proposals set out in the Notice.[7/] Instead, the Association urges the Commission to adopt provisions such as those suggested by AMTA and PCIA in their comments. These devices should be permitted at limited power levels on a strictly secondary, non-interference basis, and their deployment should be reflected on the associated FCC authorizations or by mandatory notification to co-channel licensees. AMTA recommends that a simple FCC notification process be used, along the lines proposed in AMTA's comments, since it will ensure that the disclosure is

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5/ 47 C.F.R. 90.621(b)(4) (permitting co-channel stations to be separated by less than 113 km by meeting certain transmitter ERP and antenna height criteria); 47 C.F.R. 90.621(b)(5) (permitting co-channel station to be separated by less than the short-spacing separation table definitions if an applicant submits letters of concurrence from co-channel licensees).

6/ It currently is not certain whether the 220 MHz commercial industry will more closely approximate the 800 MHz or 900 MHz SMR services in terms of spectrum environment. Second Memorandum Opinion and Order and Third Notice of Proposed Rulemaking, In the Matter of Amendment of Part 90 of the Commission's Rules to Provide for the Use of the 220-222 MHz Band by the Private Land Mobile Radio Service, PR Docket No. 89-552, RM 8506, FCC 95-312 (Released August 28, 1995). AMTA recommends that the signal booster rules adopted for the 220 MHz band mirror those in whichever service proves more comparable.

7/ In its Comments, AMTA noted the limited availability of the more benign Class A boosters. The Commission's rules must reflect the practical reality that most parties will utilize Class B boosters with their greater interference potential.

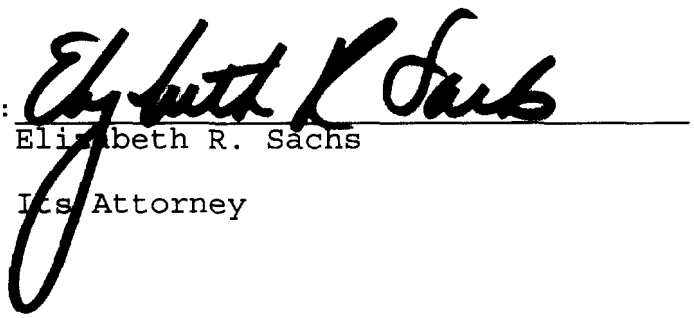
available to all potentially affected parties. Licensee notification would necessarily be limited to those within a specified geographic area and is more susceptible to errors and omissions. However, either approach is workable, and notification in some form is essential. The Association would be pleased to cooperate with the FCC in developing and maintaining appropriate procedures at the Commission's request.

AMTA supports the more ubiquitous availability of signal boosters in the Part 90 services. The record in this proceeding clearly supports service-specific rules that will permit the use of these devices under appropriate circumstances and under conditions that will minimize the potential for inter-system interference.

For the reasons described above, AMTA urges the FCC to proceed expeditiously to adopt rules consistent with the recommendations herein.

Respectfully submitted,

AMERICAN MOBILE TELECOMMUNICATIONS ASSOCIATION, INC.

By: 
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September 1, 1995

CERTIFICATE OF SERVICE

I, Catherine M. Seymour, a secretary in the law firm of Lukas, McGowan, Nace & Gutierrez, Chartered, do hereby certify that I have had hand delivered on this 1st day of September, 1995, copies of the foregoing "REPLY COMMENTS OF THE AMERICAN MOBILE TELECOMMUNICATIONS ASSOCIATION, INC." to the following:

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